

EXHIBIT

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**pUNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to: <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN) ECF Case

DECLARATION OF DANIEL A. NARLOCK

I, DANIEL A. NARLOCK, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based on my personal knowledge unless otherwise indicated.

2. I was a citizen of the United States on September 11, 2001, and remain so today. Attached, as Exhibit A to this Declaration, is a true and correct copy of my proof of citizenship.

3. On September 11, 2001, I was present at World Trade Center South Tower when the terrorist attacks of the World Trade Center Towers occurred. At the time of the attacks, I was working for Morgan Stanley on the 61st Floor of the World Trade Center South Tower.

4. After the first airplane plunged into the North Tower, my coworkers and I were initially told that the airplane was a commuter jet and that the event was merely an accident. We were then instructed to continue working. However, I did not feel comfortable remaining

in the building. I began to exit the South Tower using the stairwell. Many other people were already in the stairwell making the long descent to exit the building as well. I made it down between the 57th and 58th floors when United Flight 175 crashed into the South Tower a mere nineteen floors above me. The impact of the resulting explosion threw me down the stairwell. Emergency alarms began blaring, fire sprinklers started spraying water everywhere, and the stairwell immediately began to fill with smoke, chemicals and debris. I could see fire and burning debris as I gathered myself to begin climbing down the stairwell again. Within minutes, I was unable to see more than a few feet in front of my face due to the smoke and debris. I could not breathe thru the debris and smoke cloud, so I used my undershirt as a sort of mask to cover my mouth and nose. People all around me were injured, scared, and screaming. The situation was horrible. It took me more than 40 minutes to finally reach the bottom floor and escape from the South Tower.

5. As I finally escaped from the building, I could see on the sidewalk and street the bodies of those poor souls who had been blown out of the building or who had jumped to their deaths as fire engulfed the Towers. Within seconds of being outside on the street, the body of a man landed on the pavement, just barely missing me. I had managed to walk just a block when the South Tower began to fall. I ran as fast as I could down the street as the cloud of debris, concrete and chemicals blew down towards me. It sounded like a freight train was chasing me. I eventually made my way thru the door of a business to escape the debris cloud and fumes of the crashing building. I and others hid in this business for about thirty minutes before we tried to leave thru the backdoor. When we eventually looked outside, we saw the North Tower collapsing just as the South Tower had shortly after my escape.

6. As a result of these terrorist attacks, I suffered the following specific physical injuries on September 11, 2001: broken right foot/ankle, emphysema, COPD, asthma, and seizures. I suffered the broken right foot/ankle after being thrown down the stairwell when the plane hit the South Tower. Today, I suffer irreversible damage to my lungs, including emphysema, COPD, and asthma from the extreme intense exposure to the smoke, debris and chemicals in the stairwell and the dust cloud created by the Towers' collapse. I also suffer from seizures which began sixty days after the attacks and have been linked to my 9/11 exposure to chemicals, including but not limited to, burning aluminum and copper.

7. I have also been diagnosed with Post Traumatic Stress Disorder (PTSD). I suffer bouts of anger and hopelessness. Loud sudden noises frighten me and give me flashbacks to the day of the 9/11 attacks. I can no longer be in a room or building with too many people and only limited exits. I always sit with my back to a wall facing an exit because I am always concerned about the potential for a catastrophic event occurring at my location.

8. I sought medical attention for my injuries, and I continue to receive medical treatment for my lung damage and seizures. Attached as Exhibit B to this Declaration is a true and correct copy of my select relevant medical records related to the treatment that I received following the September 11th terrorist attacks.

9. I previously pursued a claim (Claim Number VCF Unknown) through the September 11th Victim Compensation Fund specifically related to my physical injuries incurred on September 11, 2001, and my claim was determined to be eligible for compensation.

I declare UNDER PENALTY OF PERJURY that the foregoing is true and correct.

EXECUTED on this 30 day of September 2020.


Declarant, Daniel A. Narlock

**EXHIBITS
FILED
UNDER SEAL
(ECF No.
5716)**